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14 UNITED STATES DISTRICT COURT
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16 NORTHERN DISTRICT OF CALIFORNIA
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18 SAN FRANCISCO DIVISION

19 WAYMO LLC,

Case No. 17-cv-0939-WHA

20 Plaintiff,

NON-PARTY RICHARD JACOBS'
MOTION FOR ADMINISTRATIVE
RELIEF TO FILE PORTIONS OF THE
DECLARATION OF MARTHA BOERSCH
IN SUPPORT OF MOTION FOR LEAVE
TO FILE MOTION FOR
RECONSIDERATION AND ATTACHED
EXHIBIT UNDER SEAL

21 v.

22 UBER TECHNOLOGIES, INC.,

23 Defendant.

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Pursuant to Northern District of California Civil Local Rules 7-11 and 79-5, Non-party Richard Jacobs respectfully submits this Motion for Administrative Relief to File Portions of Halunen Letter and Declaration of Martha Boersch In Support of Motion for Leave to File Motion for Reconsideration Under Seal. Mr. Jacobs requests to file under seal portions of paragraph number two of the Declaration of Martha Boersch In Support of Motion for Leave to File Motion for Reconsideration and Exhibit A attached thereto.

A document or portions thereof may be filed under seal if “privileged, protectable as a trade secret or otherwise entitled to protection under the law.” Civ. L. R. 79-5(b). Good cause exists to seal because the proposed redactions:

1. Protect the safety of Uber employees abroad because, absent the redactions, the identity and conduct of such persons are or could be easily revealed given the context (Redaction Nos. 11, 12, 13, 21). The proposed additional redactions withhold the person’s names or details sufficient to identify such persons;
2. Protect the safety of Uber employees abroad because, absent the redactions, the nature, location, and/or timing of Uber’s activities abroad are revealed and such revelation could, in context, reveal the identity of individual persons who may be subjected to harm (Redaction Nos. 4, 5, 6, 7, 8, 9, 10, 14, 15, 16, 17, 18, 19, 20, 22, 23, 24, 25). The proposed additional redactions withhold minor details of Uber’s activities to withhold information sufficient to identify the location and timing of certain Uber activities, all of which are unrelated to the dispute between the parties here;
3. Protect the safety of individuals who currently or formerly worked in some capacity for the United States intelligence services, as well as the identity of certain United States intelligence operations (Redaction Nos. 1, 2). These redactions are limited in scope and, again, do not pertain to the dispute between the parties here; and
4. Protect the safety of employees of a non-party who have been subject to harassment and violence in the past as a result of their activity (Redaction No. 3). Boersch Decl., ¶ 2.

1 For the foregoing reasons, Mr. Jacobs requests that the Court grant his Administrative Motion
2 to Seal.

3 Dated: December 12, 2017

BOERSCH SHAPIRO LLP

4 /s/ Martha Boersch

5 MARTHA BOERSCH
6 Attorney for Richard Jacobs

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